

### **REMARKS**

Claims 1 and 3-16 are pending in this application, all of which have been amended. No new claims have been added.

### **PRIOR ART REJECTIONS**

Claims 1-14 and 16 stand rejected under 35 U.S.C. §103(a) as unpatentable over **Miyake et al.** (previously applied) in view of **Forsl w** (previously applied), U.S. Patent 7,085,814 to Gandhi et al. (hereafter "**Gandhi et al.**") and further in view of **Kim** (previously applied).

Applicants respectfully traverse this rejection.

**Miyake et al.** discloses a network managing method, medium and system capable of managing a plurality of types of logical networks for one network entity composed of a plurality of objects. Information on network topologies is collected from each of the plurality of objects. Display data is created for each of a plurality of types of logical network topologies for each object in accordance with the collected information on network topologies. A control is conducted in accordance with the created display data so as to display a physical connection relationship, a logical connection relationship, and a virtual connection relationship on a virtual screen.

The Examiner has admitted that **Miyake et al.** does not explicitly disclose component nodes generating a unique global address or transmitting the generated global address, attribute information of the system component node and installation position information of the system component node, to the network, but he has cited **Forsl w** for teaching this feature.

**Forsl w** discloses a network-based mobile workgroup system which is an access management system for mobile users with VPN and firewall functionality built in. The mobile user can access the mobile workgroup system over a set of access technologies and select server resources and correspondent nodes to access pending their workgroup membership approvals. All workgroup policy rules are defined in a

mobile service manager and pushed down to one or more mobile service routers for policy enforcement. The mobile service router closest to the mobile client, and being part of the mobile virtual private network, performs regular authentication checks of the mobile client during service execution. At the same time it performs traffic filtering based on the mobile user's workgroup memberships.

Neither of these references teaches, mentions or suggests that the plurality of system component nodes include at least one controller, as in the present invention.

The Examiner has cited column 4, lines 56-64 of Gandhi et al. for teaching this feature.

Gandhi et al. discloses a general programmatic interface-to-network messaging adapter exposes a suitable object integration interface or application programming interface to applications on a controller device and sends network data messages to invoke services or query status of a controlled device. The adapter maps application calls to the interface into network data messages according to service protocols of the controlled device. The general adapter provides the interface suitable to any specific service of a controlled device based on a data description of the interface, and converts the application calls to network data messages based on a data description of a protocol and format for network data messages to interact with the specific service.

FIG. 1 of Gandhi et al. shows a "user control point 104, 105" for each "controlled device 106, 107." Neither these sections of Gandhi et al., nor any other section of Gandhi et al., discloses a plurality of system component nodes include at least one controller, as in the present invention.

The Examiner has cited Kim for teaching a plurality of system component nodes including at least one of a sensor and an actuator.

Applicants respectfully disagree.

Although FIG. 9 of Kim shows a sensor 902, there is no disclosure of an actuator.

In contrast to Kim, in combination with any or all the other cited references, the present invention shown in exemplary FIG. 2 has a plurality of system component nodes which include at least one controller, at least one sensor and at least one actuator. None of the cited references discloses an actuator.

Accordingly, claim 1 has been amended to clarify this distinction.

The cited references all relate to an office network and the like, in contrast to the present invention, which is an industrial automation control system which performs control and monitoring of a plant, as disclosed in paragraph [0002] of the specification.

Accordingly, claim 1 has been amended to recite this distinction.

Lastly, paragraph [0080] of the specification discloses that the controller operates the actuator based on data from the sensor, which is not disclosed in the cited references.

Therefore, the combination of Miyake et al., Forsl w, Gandhi et al., and Kim does not form the invention defined by claims 1, 3-14 and 16. Thus, Applicant submits that the rejection of claims 1, 3-14 and 16 under 35 U.S.C. §103(a) is improper and respectfully requests that it be withdrawn.

Claim 15 has been indicated as allowable if rewritten in independent form.

Accordingly, Claim 15 has been so amended. Therefore, Applicant respectfully submits that claim 15 is now allowable, and allowance is respectfully solicited.


In view of the aforementioned amendments and accompanying remarks, claims 1 and 3-16, as amended, are in condition for allowance, which action, at an early date, is respectfully solicited.

The Director is hereby authorized to charge any deficiency in the fees filed, asserted to be filed or which should have been filed herewith (or with any paper hereafter filed in this application by this firm) to our Deposit Account No. 04-1105.

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Respectfully submitted,

CUSTOMER NO.: 21874

By   
William L. Brooks  
Registration No.: 34,129  
EDWARDS ANGELL PALMER & DODGE  
LLP  
P.O. Box 55874  
Boston, Massachusetts 02205  
(202) 478-7376  
Attorneys/Agents For Applicant